REMARKS

This is responsive to the Office Action dated June 4, 2003 in which the Examiner rejects all the pending claims as either under 35USC §102 (e) as being anticipated by Radziewicz (US Patent No. 5,854,897) or by Haserodt (US Patent No. 6,031,836), or as being obvious over combinatioins of Radziewicz, Haserodt, Rondeau (US Patent No. 5,850,433), Gabber (US Patent No. 5,961,593), Herz (US Patent No. 5,754,938) and Van Hoff (US Patent No. 5,822,539) under 35USC §103(a). The applicants have further amended independent claims 1, 19 and 33 to patentably distinguish them over the cited patents, and also amended claims dependent claims 13, 35, 39, 42 and 43 as well as deleted claims 40 and 41 for consistency and for perfecting the claims language. The applicants respectfully traverse the rejections of the Examiner based on the amended claims as well as the following detailed explanation.

I.   ·Independent claims 1, 19 and 33:

Independent claims 1, 19 and 33 have been further amended with a limitation that the determining of the additional content is <u>based on a network server identifier identifying the targeted network server</u>, which was a feature defined in the previous dependent claims 35 and 40 – 43. The applicants respectfully disagree with the assertion of the Examiner that this feature's disclosed in Radziewicz (US Patent No. 5,854,897) or Herz (US Patent No. 5,754,938).

In particular, Radziewicz does <u>NOT</u> teach or imply that the additional content is determined <u>based on the network server identifier</u> (e.g., the IP address or URL of the computer 12). The applicants have reviewed Radziewicz carefully and cannot find any such teaching as asserted by the Examiner. It is noted by the applicants that the portion of Radziewicz at col. 10, lines 9-15 cited by the Examiner does not describe that the additional content is determined

based on the address of the targeted server (computer 12), but only describes that the controller 54 records various statistical information about the advertisements including the IP address of the subscriber and/or URL of the computer 12 accessed (see col. 10, lines 8-15). The applicants also note that Radziewicz mentions to determine the timing of playing the announcements based on a number of factors including "the IP or URL of a computer 12" (see col. 7, lines 20-26), however, throughout Radziewicz, the applicants can not find any teaching or implication that <u>the additional content is determined based on the IP or URL of the computer 12</u>. In fact, Radziewicz discloses a technique to play advertisement to a client when the connection is still idle while the client is waiting for the requested content. As explained in Radziewicz, this technique is preferably implemented as a client-subscription service, and thus preferably the information at the client end (DTE 14), but not that of the targeted service server (host computer 12), is used to select the advertisements.

By the way, since Radziewicz does not disclose the distinguishing feature that <u>the additional content is determined based on the IP or URL of the targeted network server (computer 12)</u>, and thus Radziewicz does not claim the same invention as the present one, Radziewicz is now believed not qualified as a prior art under 35USC §102 or §103.

The above distinguishing feature is not disclosed in Herz either. As noted by the Examiner, Herz does generally mention that the advertising material is "related to the user's request" at col. 39, lines 64-67, however, Herz does not teach or imply that the advertising material is determined <u>based on the identifier (such as URL) of the targeted information server S4</u>. In fact, in a typical example described in Herz at col. 40, lines 1-16, the advertising material is determined based on the retrieved requested content (target object X), but not on the identifier of the information server S4.

Therefore, the applicants believe that the amended independent claims 1, 19 and 33, with the distinguishing feature that <u>the additional content is determined based on a network server identifier (which is included in the request) identifying the targeted network server</u>, is not anticipated by Radziewicz or Herz. Moreover, the applicants also cannot find this distinguishing feature in any other cited patents, and thus believe that claims 1, 19 and 33 are patentable.

II.   Independent claims 24 and 29:

The applicants respectfully disagree with the assertion of the Examiner that independent claims 24 and 29 are anticipated by Radziewicz or Haserodt.

As to claim 24, Radziewicz does not disclose that a bridge server (NPS 16) receives from a client (DTE 14) a request targeting a network server (computer 12), marks up <u>the</u> request, and returns <u>the</u> marked-up request to the client for re-submission, as defined in claim 24. It is noted that, in the present invention as defined in claim 24, <u>there is only one request involved, i.e., the request targeting the network server</u>. However, in the scenarios in Radziewicz, after getting the access page of the NSP 16, the client first sends a first request <u>targeting the advertising service</u> at step 206 by entering an URL, clicking on an icon, or as a result of a browser default setting (see col. 17, lines 64-67) so the advertisement will be played in the display window of the browser, and at step 224, the user sends a second request (i.e., the service request) targeting the network server (computer 12) which is routed to the computer 12 (see col. 18, lines 30-42). Therefore, in Radziewicz, the request <u>targeting the network server</u> (computer 12) is NOT marked up by the bridge server (NSP 16), NOT returned to the client (DTE 14), and, of course, there is no re-submission by the client of such request.

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Similarly, Radziewicz does not disclose a client system having means for transmitting a request targeting a network server, receiving the request from a bridge server in a marked up form marked up by the bridge server, and for re-transmitting the request in said marked-up form, as defined in claim 29.

Because the Examiner simply repeats the claimed language in the Office Action to support his assertion without citing relevant portions in Radziewicz's Specification, the applicants cannot understand the reasoning or locate the relevant disclosure that is supposed to support the assertion. Therefore, the applicants respectfully request and would highly appreciate a detailed explanation from the Examiner on which steps and/or elements in Radziewicz are read as the features defined in claims 24 and 29.

The Examiner also holds in the Office Action that claims 24 and 29 are anticipated by Haserodt because "Haserodt discloses ... the web server transmitted a form which has the marked up request for the client enter the information in order to resubmitted to the web server (Page 11 of the Office Action). Moreover, the Examiner further asserts in the Office Action that "the bridge server marked up the request into a markeup form to forward to client" (Page 5 of the Office Action). The applicants respectfully disagree because it is the client but not the bridge server 104 that marks up the request (feature form or page 115), as further explained in below.

In Haserodt, a web page 115 carrying a blank feature form is downloaded from the server 104 to the client 103, and then a user of the client 103 uses a browser 113 to mark up the blank feature form and uploads the marked up page 115 back to the server 104 (col. 3, line 55 – col. 4, line 5). It is unambiguously described throughout Haserodt that the feature form/page 115 (the "request" in claim 24) is marked up by a user of the client 103 but NOT by the server 104. For example, it is described in Haserodt that "the user then uses browser 113 to mark up the feature

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form ... at step 208. When the user is finished, browser uploads the marked up page 115 back to server 104, at step 210 ... (col. 3, line 67 – col. 4, line 4), "server 104 receives the marked up page 115, at step 212, ... to interpret the marked up page 115, i.e., to determine from the feature form which features the user selected, ... at step 214 (col. 4, lines 6-12)", etc. This is also clearly shown in Figure 2 of Haserodt.

Therefore, the applicants believe claim 24 is not anticipated by Haserodt. For the similar reasons, claim 29 is not anticipated by Haserodt either.

The applicants have reviewed carefully the Haserodt patent, especially the portion at col. 3, line 55 to col., 4, line 60 cited by the Examiner, but find a contrary description to the assertion of the Examiner. Therefore, the applicants respectfully request a detailed explanation from the Examiner on which specific portions and sentences in Haserodt support the assertion that the bridge server marked up the request into a markup form to forward to client.

Moreover, the applicants have also reviewed other cited patents and believe claims 24 and 29 are not anticipated by, or obvious over, other cited patents either. Therefore, claims 24 and 29 are believed patentable.

III.   Dependent claims 2-4, 6-9, 11, 13-18, 21-23, 25, 30, 34-39 and 42-43:

At least for the above reasons as to the patentability of independent claims, all the dependent claims are also believed patentable. In particular, for the similar reasons to claims 24 and 29, claims 13-16 and 23 are also patentable as none of the cited patents discloses to mark up by the bridge server the request targeting the network server and returns the marked up request to the client for resubmission.

The applicants respectfully request reconsideration and allowance of claims in view of the above. The Examiner is authorized to deduct any fees believed due from our Deposit Account No. 11-0223.

Respectfully submitted,

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CERTIFICATE OF MAILING